

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

TERRA CHAMBERS, )  
 )  
 Plaintiff, )  
 )  
 v. ) Case No. 4:20-cv-01617  
 )  
 GURPREET PADDA, M.D., et al., )  
 )  
 Defendants. )

**DEFENDANTS INTERVENTIONAL CENTER FOR PAIN  
MANAGEMENT, P.C. AND GURPREET PADDHA'S  
MOTION TO STAY DISCOVERY AND FOR A PROTECTIVE ORDER**

COME NOW Defendants Interventional Center for Pain Management, P.C. d/b/a Center for Interventional Pain Management and Gurpreet Padda, M.D., by and through their undersigned attorney, and pursuant to Fed. R. Civ. P. 26(c), move the Court for entry of a protective order staying discovery pending the Court's ruling on Defendants' motion to dismiss and for further relief as the Court deems just and appropriate.

This motion is based on the memorandum in support filed herewith.

Respectfully submitted,

ROSENBLUM, SCHWARTZ & FRY, P.C.

By: /s/ N. Scott Rosenblum  
N. SCOTT ROSENBLUM # 33390MO  
Attorney for Defendants Padda and CIPM  
120 South Central Avenue, Suite 130  
Clayton, Missouri 63105  
(314) 862-4332/Facsimile 862-8050  
[srosenblum@rsflawfirm.com](mailto:srosenblum@rsflawfirm.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on March 11, 2021, the foregoing was served by means of the Court's CM/ECF system upon all counsel of record.

/s/ N. Scott Rosenblum